

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

)	
In re:)	Chapter 11
)	
Voyager Aviation Holdings, LLC <i>et al.</i> ,)	Case No. 23-11177 (JPM)
)	
Debtors. ¹)	(Jointly Administered)
)	

**FIRST SUPPLEMENTAL DECLARATION OF
ROBERT A. DEL GENIO IN SUPPORT OF THE
DEBTORS' APPLICATION FOR ENTRY OF ORDER
(I) AUTHORIZING EMPLOYMENT AND RETENTION OF
FTI CONSULTING, INC. TO PROVIDE CHIEF RESTRUCTURING
OFFICER AND SUPPORTING PERSONNEL TO THE DEBTORS,
EFFECTIVE AS OF JULY 27, 2023 AND (II) GRANTING RELATED RELIEF**

Pursuant to 28 U.S.C. § 1746, Robert A. Del Genio declares as follows:

1. I am a Senior Managing Director with FTI Consulting, Inc. ("FTI"), a public corporation whose common stock is listed on the New York Stock Exchange and is traded under the symbol "FCN." FTI has numerous wholly-owned subsidiaries as set forth on Exhibit 1 hereto.²

2. Additionally, subject to this Court's approval, I am also serving as the Chief Restructuring Officer of Voyager Aviation Holdings, LLC ("VAH") and, together with the other

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's tax identification number, are: Voyager Aviation Holdings, LLC (8601); A330 MSN 1432 Limited (N/A); A330 MSN 1579 Limited (N/A); Aetios Aviation Leasing 1 Limited (N/A); Aetios Aviation Leasing 2 Limited (N/A); Cayenne Aviation LLC (9861); Cayenne Aviation MSN 1123 Limited (N/A); Cayenne Aviation MSN 1135 Limited (N/A); DPM Investment LLC (5087); Intrepid Aviation Leasing, LLC (N/A); N116NT Trust (N/A); Panamera Aviation Leasing IV Limited (N/A); Panamera Aviation Leasing VI Limited (N/A); Panamera Aviation Leasing XI Limited (N/A); Panamera Aviation Leasing XII Designated Activity Company (N/A); Panamera Aviation Leasing XIII Designated Activity Company (N/A); Voyager Aircraft Leasing, LLC (2925); Voyager Aviation Aircraft Leasing, LLC (3865); Voyager Aviation Management Ireland Designated Activity Company (N/A); and Voyager Finance Co. (9652). The service address for each of the Debtors in these cases is 301 Tresser Boulevard, Suite 602, Stamford, CT 06901.

² Additional information regarding FTI's corporate structure and subsidiaries may be found in FTI's most recent 10-K filed with the United States Securities and Exchange Commission on February 23, 2023, a copy of which is available at: <https://ir.fticonsulting.com/node/22686/html>.

above-captioned debtors in possession, the “Debtors”) and have served in such capacity since July 25, 2023.

3. I submit this declaration (the “Declaration”) in further support of the *Debtors’ Application for Entry of Order (I) Authorizing Employment and Retention of FTI Consulting, Inc., Effective as of July 27, 2023 to Provide Chief Restructuring Officer and Supporting Personnel to the Debtors and (II) Granting Related Relief* [Docket No. 113] (the “Application”)³ and to supplement my original declaration (the “Original Declaration”), which was annexed as Exhibit B to the Application.

SUPPLEMENTAL DISCLOSURES

4. In addition to the disclosures set forth in the Original Declaration, FTI discloses the following:

- Additionally, included in the \$2,538,605 paid prior to the petition date, is \$40,858.68 in payments that exceeded FTI’s actual time incurred for the two weeks prior to the petition date. We will apply this \$40,858.68 against our first post-petition invoice.
- Paragraph 17 of the Original Declaration described the procedures FTI took to identify relationships FTI has with the entities listed on Schedule 1 to the Original Declaration and included a footnote which noted that the computer database referenced in paragraph 17 includes FTI and its wholly-owned subsidiaries globally. As noted above, FTI is a publicly-traded corporation with numerous subsidiaries. For the avoidance of doubt, FTI does not have a parent entity, nor any subsidiaries or affiliates other than those listed on Exhibit 1.

³ Capitalized terms used but not otherwise defined herein have the respective meanings ascribed to such terms in the Application.

- Regarding FTI personnel other than Mr. Del Genio, please see the below table for detail on Supporting Personnel:

FTI Supporting Personnel	Title	Location
John Streck	Senior Managing Director	New York
Rachel Chesley	Senior Managing Director	New York
Cynthia Kielkucki	Managing Director	Chicago
Gregory Surabian	Senior Director	Los Angeles
Julian Gordy	Director	Denver
Kyra Adajian	Director	New York
Sydney Shaw	Senior Consultant	New York
Connor Gaskin	Senior Consultant	Los Angeles
Diana Baldo	Senior Consultant	New York
Mary Claire Stevenson	Consultant	Dallas
Samantha Hardey	Consultant	New York

- Schedule 2 to the Original Declaration identified certain parties in interest as former clients. “Former clients” are former FTI clients for whom FTI has not provided services in the previous two (2) years before the Petition Date.
- The Company’s board consists of Hooman Yazhari, Alan Alperin, Marjorie Bowen, and Steven Varner. They are all independent board members. The CRO attends board meetings at the invitation of the Board of Directors, but is not a member of the Board of Directors. The CRO will report to and be subject to supervision by the board.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Respectfully submitted,

Dated: September 18, 2023

/s/ Robert A. Del Genio

Robert A. Del Genio

Senior Managing Director, FTI Consulting, Inc.

Exhibit 1

FTI Subsidiaries

Subsidiary	Domestic Jurisdiction
Bold Capital Holding B.V.	Netherlands
Bold Capital Management B.V.	Netherlands
Bold Investment Management B.V.	Netherlands
Bold Support Optimisation B.V.	Netherlands
Compass Lexecon (Belgium) SRL	Brussels
Compass Lexecon Economic Consulting (Beijing) Co., Ltd.	Beijing
Compass Lexecon LLC	Maryland
Compass Lexecon Spain, S.L.	Spain
Compass Lexecon SRL	Buenos Aires
Cumulus Fund	Cayman Islands
Cumulus Lower Volatility Fund	Cayman Islands
Cumulus Master Fund	Cayman Islands
FD MWA Holdings Inc.	Delaware
Ferrier Hodgson Management Services Inc.	Philippines
FH Asset Management Corp.	Philippines
FH Corporate Services Inc.	Philippines
FTI (China) Limited	Hong Kong
FTI Capital Advisors - Canada ULC	British Columbia
FTI Capital Advisors (Australia) Pty Ltd	New South Wales
FTI Capital Advisors (DIFC) Limited	Dubai International Financial Centre
FTI Capital Advisors (Hong Kong) Limited	Hong Kong
FTI Capital Advisors, LLC	Maryland
FTI Capital Management (Cayman) Limited	Grand Cayman

Subsidiary	Domestic Jurisdiction
FTI Capital Management LLC	Maryland
FTI Consulting - FD Australia Holdings Pty Ltd	Victoria
FTI Consulting - Qatar LLC	Doha
FTI Consulting (Asia) Ltd	Hong Kong
FTI Consulting (Australia) Pty Ltd	Queensland
FTI Consulting (Beijing) Co., Limited	Beijing
FTI Consulting (BVI) Limited	British Virgin Islands
FTI Consulting (Cayman) Ltd	Grand Cayman
FTI Consulting (China) Ltd.	Shanghai
FTI Consulting (DIFC) Limited	Dubai International Financial Centre
FTI Consulting (Government Affairs) LLC	New York
FTI Consulting (Hong Kong) Limited	Hong Kong
FTI Consulting (Hong Kong) Services One Limited	Hong Kong
FTI Consulting (Hong Kong) Services Two Limited	Hong Kong
FTI Consulting (ME) Limited	Abu Dhabi
FTI Consulting (Perth) Pty Ltd	Perth
FTI Consulting (SC) Inc.	New York
FTI Consulting (Singapore) Pte. Ltd.	Singapore
FTI Consulting (Strategic Communications) S.A.S.	Paris
FTI Consulting (Sydney) PTY LTD	New South Wales
FTI Consulting Acuity LLC	Maryland
FTI Consulting Australia Nominees Pty Ltd	Victoria
FTI Consulting B.V.	Amsterdam

Subsidiary	Domestic Jurisdiction
FTI Consulting Belgium SRL	Brussels
FTI Consulting Canada Inc.	British Columbia
FTI Consulting Canada ULC	British Columbia
FTI Consulting Capital Advisors (Singapore) Pte Ltd.	Singapore
FTI Consulting Corporate Services (Cayman) Limited	Grand Cayman
FTI Consulting Denmark ApS	Copenhagen
FTI Consulting Deutschland GmbH	Frankfurt am Main
FTI Consulting Deutschland Group Holdings GmbH	Frankfurt am Main
FTI Consulting Deutschland Holding GmbH	Munich
FTI Consulting Finland Limited	England & Wales
FTI Consulting for Business Services	Kingdom of Saudi Arabia
FTI Consulting Global Holdings Limited	England & Wales
FTI Consulting Group Holdings, Inc.	District of Columbia
FTI Consulting Group Limited	England & Wales
FTI Consulting Gulf Limited	England & Wales
FTI Consulting Holdings, Inc.	Delaware
FTI Consulting India Private Limited	India
FTI Consulting International Limited	British Virgin Islands
FTI Consulting Italy S.R.L.	Italy
FTI Consulting LLC	Maryland
FTI Consulting LLP	England & Wales
FTI Consulting Malaysia SDN. BHD.	Kuala Lumpur
FTI Consulting Management Limited	England & Wales

Subsidiary	Domestic Jurisdiction
FTI Consulting Management Ltd	Hong Kong
FTI Consulting Management Services Limited	British Virgin Islands
FTI Consulting Management Solutions Limited	Dublin
FTI Consulting Media Center FZ-LLC	Dubai Development Authority Free Zone
FTI Consulting México, S.C.	Federal District
FTI Consulting Pte Ltd.	Singapore
FTI Consulting Realty LLC	New York
FTI Consulting Realty, Inc.	California
FTI Consulting S.A.S.	Bagota
FTI Consulting SC GmbH	Frankfurt am Main
FTI Consulting Services (Israel) Ltd	Tel Aviv
FTI Consulting Solutions Limited	England & Wales
FTI Consulting South Africa (Pty) Ltd	South Africa
FTI Consulting Spain, S.R.L.	Madrid
FTI Consulting Switzerland GmbH	Switzerland
FTI Consulting Technology (Sydney) PTY LTD	Victoria
FTI Consulting Technology LLC	Maryland
FTI Consulting Technology Software Corp.	Washington
FTI Consulting Trade Advisory, LLC	Texas
FTI Consulting UK1 Holdings Limited	England & Wales
FTI Consulting UK2 Holdings Limited	England & Wales
FTI Consulting UK3 Holdings Limited	England & Wales
FTI Consulting, Inc.	Maryland

Subsidiary	Domestic Jurisdiction
FTI Consultoria Ltda.	São Paulo
FTI Director Services Limited	British Virgin Islands
FTI Director Services Number 2 Limited	British Virgin Islands
FTI Director Services Number 3 Limited	British Virgin Islands
FTI Financial Services Limited	England & Wales
FTI France SAS	Paris
FTI Hosting LLC	Maryland
FTI International LLC	Maryland
FTI Investigations, LLC	Maryland
FTI UK Holdings Limited	England & Wales
FTI, LLC	Maryland
FTI-Andersch AG	Frankfurt am Main
FTI-Andersch digital GmbH	Berlin
FTI-Andersch Management GmbH	Potsdam
Greenleaf Power Management LLC	Maryland
IRL (Holdings) Limited	British Virgin Islands
OC 536 Offshore Fund, Ltd.	Cayman Islands
Portal Arbitrage Opportunities Offshore Fund Ltd.	Cayman Islands
PT. FTI Consulting Indonesia	Jakarta
Sports Analytics LLC	Maryland
The Lost City Estates S.A.	Panama City
Value Realisation GP LTD	Grand Cayman